



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



January 27, 2020

**Federally-Enforceable District-Origin Operating Permit
(FEDOOP)
Statement of Basis**

Source: Brenntag Mid-South, Inc.
3900 Tucker Ave
Louisville, KY 40216

Owner: Brenntag Mid-South, Inc.
1405 Hwy. 136 West
Henderson, KY 42420

Application Documents:	See Table I-9	Administratively Complete:	09 03, 2019
Draft Permit:	Dec 21, 2019	Proposed Permit:	Dec 21, 2019
Permitting Engineer:	Ulalo Chirwa	Permit Number:	O-0221-19-F
Plant ID:	0221	SIC:	5169
		NAICS:	42269

Introduction:

This permit will be issued pursuant to District Regulation 2.17- Federally Enforceable District Origin Operating Permits. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

This permit's action renews the company's operating permit.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}). Jefferson County is classified as a nonattainment area for ozone (O₃). This facility is located in the portion of Jefferson County that is in attainment area for sulfur dioxide (SO₂).

Permit Application Type:

<input checked="" type="checkbox"/> Initial issuance	Permit Revision	<input type="checkbox"/> Permit renewal
	<input type="checkbox"/> Administrative	
	<input type="checkbox"/> Minor	
	<input type="checkbox"/> Significant	

Compliance Summary:

<input checked="" type="checkbox"/> Compliance certification signed	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Source is out of compliance	<input checked="" type="checkbox"/> Source is operating in compliance

I Source Information**1. Product Description:**

The source receives and distributes chemicals.

2. Process Description:

Shipping and distributing prepackaged chemicals and offloading of chemicals from railcar to truck or truck/trailer.

3. Site Determination:

There are no other facilities that are contiguous or adjacent to this facility.

4. Emission Unit Summary:

Emission Unit	Equipment Description
U1	Rail car to truck bulk loading, 4500 gph

5. Fugitive Sources:

The source identified no fugitive sources of emissions.

6. Permit Revisions:

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
NA	05/27/2001	11/05/2001	Initial	Initial Permit Issuance
125-01-F(R1)	05/07/2007	06/30/2007	Renewal	Permit Renewal
125-01-F(R2)	10/11/2014	11/12/2014	Renewal	Permit Renewal
O-0221-19-F	12/21/2019	01/27/2020	Renewal	Permit Renewal; Source has indicated the removal of solvent storage tanks, solvent packaging, and bulk tanker loading that was previously permitted in 125-01-F(R2). Source will distribute chemicals packaged outside of Jefferson County, handle liquid bleach (sodium hypochlorite) and will lease a railroad spur that may be used to load VOC or HAP materials into truck or trailers.

7. Construction Permit History: NA

8. Application and Related Documents

Document Number	Date	Description
114160	8/30/2019	FEDOOP Renewal Application
124328	9/3/2019	Administratively complete letter

9. Emission Summary

Pollutant	District Calculated Actual Emissions (tpy) 2017 Data*	Pollutant that triggered Major Source Status (based on PTE)
CO	NA	No
NO _x	NA	No
SO ₂	NA	No
PM ₁₀	NA	No
VOC	6.46	Yes
Total HAPs	NA	Yes

*Emission reported by source in the 2017 compliance report.

10. Applicable Requirements

<input type="checkbox"/> 40 CFR 60	<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> 40 CFR 63
<input type="checkbox"/> 40 CFR 61	<input checked="" type="checkbox"/> District Origin	<input type="checkbox"/> Other

11. Referenced Federal Regulations:

NA

Non-Applicable Regulations: NA

II Regulatory Analysis**1. Stratospheric Ozone Protection Requirements:**

Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Brenntag Mid-South does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

2. Basis of Regulation Applicability

a. Applicable Regulations

Regulation	Title	Basis
5.15	Chemical Accident Prevention Provisions	This regulation controls emissions of toxic air pollutants (TAPs) from processes or process equipment that were constructed or modified between November 11, 1986 and July, 2005
7.22	Standard of Performance for new Volatile Organic Materials Loading Facilities	This regulation applies to each loading facility which loads more than 200 gallons in any one day of volatile organic materials into tank trucks, trailers, or railroad tank cars commencing on or after the effective date of this regulation.

b. Plantwide

Brenntag Mid-South is potentially major for VOC and HAP. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Brenntag Mid-South has requested emission limits of less than 25 tons per year for all criteria pollutants, less than 12.5 tons/year for total HAPs and less than 5 tons per year for each individual HAP to be considered exempt from local TAC (STAR) regulations, as defined by Regulation 5.00, section 1.13.5.

Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit regular reports to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.1.

c. Emission Unit U1 – Rail Car to Truck Loading

EP	Description	Applicable Regulations
EP 1	Rail car to truck bulk loading, 4500 gph	7.22

i. Standards

(1) HAP

- (a) Per Regulation 2.17, section 5.1, individual HAP emissions are limited to 5 tons during any consecutive 12-month period.
- (b) Per Regulation 2.17, section 5.1, combined HAP emissions are limited to 12.5 tons during any consecutive 12-month period. (The source has requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.)

(2) VOC

- (a) Per Regulation 2.17, section 5.1, plantwide VOC emissions are limited to 25 tons during any consecutive 12-month period. (The source has requested to be exempt from the requirements of STAR by accepting the following limits: 25 tons per year of a regulated air pollutant, 5 tons per year of a single HAP, and 12.5 tons per year of combined HAPs.)
- (b) Per Regulation 7.22, the source shall not load any volatile organic materials into any tank, truck, trailer, or railroad car unless such loading is accomplished by submerged fill, bottom loading, or equivalent methods. To avoid control requirements prescribed by Regulation 7.22, the source shall not load 20,000 gallons or more in any one day.

ii. Monitoring and Recordkeeping

Regulation 2.17, section 5.2 requires sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(1) HAP

The source must calculate and record the 12-consecutive month single and total HAP emissions in order to demonstrate compliance with the plantwide HAP limits.

(2) VOC

The source is required to monitor and maintain records of the throughput and VOC emissions for each emission point during each 12-consecutive month period.

iii. Reporting

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall submit an annual compliance certification by April 15. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an annual compliance report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

(1) HAP

The source must report the 12-consecutive month single and combined HAP emissions in order to demonstrate compliance with the plantwide HAP limits.

(2) VOC

The source is required to report the total plantwide 12-consecutive month VOC emissions for each month in the reporting period in order to demonstrate compliance with the plantwide VOC limit.

III Other Requirements

1. Temporary Sources:

The source did not request to operate any temporary facilities.

2. Short Term Activities:

The source did not report any short term activities.

3. Emissions Trading:

The source is not subject to emission trading.

4. Alternative Operating Scenarios:

The source did not request any alternative operating scenarios.

5. Compliance History:

There are no records of any violations of the terms of the present or prior construction or operating permits.

6. Calculation Methodology or Other Approved Method:

The calculated emissions are based on the gallon per hour rate and AP-42 loading loss equation.

7. Insignificant Activities

NA